

M67001.AR.006843
MCB CAMP LEJUENE
5090.3a

RESPONSE TO NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES AND THE U S EPA REGION IV COMMENTS ON THE DRAFT RECORD OF
DECISION SITE UXO-19, OU 25 MCB CAMP LEJUENE NC
08/13/2015
CH2M HILL

Response to Comments

Draft Record of Decision Site UXO 19, Operable Unit 25

Marine Corps Installations East – Marine Corps Base Camp Lejeune (MCIEAST-MCB CAMLEJ), North Carolina

PREPARED FOR: Dave Cleland, NAVFAC Mid-Atlantic
Charity Delaney, MCIEAST-MCB CAMLEJ
Gena Townsend, EPA Region 4
Randy McElveen, NCDENR

PREPARED BY: CH2M HILL

DATE: August 13, 2015

Introduction

The purpose of this document is to address comments on the Draft Record of Decision (ROD) for Site UXO-19, Operable Unit (OU) 25. The North Carolina Department of Environment and Natural Resources (NCDENR) and the United States Environmental Protection Agency (USEPA) provided the comments listed below. The responses to comments are provided in bolded text.

North Carolina Department of Environment and Natural Resources

Comments (Dated July 24, 2015)

1. Section 1.1, Selected Remedy, and Section 1.2 makes frequent references to MMRP investigations. Please provide a reference or footnote or more details about the MMRP investigations to include the fact that a Preliminary Assessment/Site Investigation (PA/SI) and an Expanded Site Investigation (ESI) were completed and documented in the Remedial Investigation (RI).

A reference to the PA/SI and ESI was added to the first paragraph of Section 1.1.

2. State acceptance as discussed under the section on Modifying Criteria, on page 2-21, should change the phrase "... its final concurrence..." to "their final concurrence".

This change has been made as requested.

3. The Cost-effectiveness category of Section 2.10.4, Statutory Determinations, on Page 2-23; should include other details about the LUCs remedy and **should include** a statement regarding the fact that the effectiveness will not be significantly or cost proportionally improved by implementing active remedies, such as alternatives 3 and 4, since the greatest risk of detonating UXO is in the top 18 inches of the site where DGM and intrusive investigation and UXO removal or destruction were completed during the PA/SI and ESI using best available technology to the maximum extent practicable.

The following statement has been added: Furthermore, the MMRP investigations conducted during the PA/SI and ESI removed the majority of MEC/MPPEH that would likely be encountered, the top 18-inches, using best available technology to the maximum extent practicable, thereby reducing overall site risk. Additional removal action would not improve the effectiveness proportionally to the additional costs.

4. One additional issue of concern is that the Military Operations on Urban Terrain (MOUT) area was removed from the final site boundary and will not be included in the LUCs area for the site. I know we have discussed this before but I wanted to bring this issue up one last time before we finalize the ROD. Is this the decision that the Base and the Navy want to support in this ROD? I know the MOUT was included in the removal work documented in the RI (See Figure 2-2 of the RI/FS report). However the MOUT had the greatest density of mortars and grenades anywhere on the site. So, the MOUT area should be a lot safer than it was but construction or digging in the area could cause a detonation of UXO and without LUCs we have no controls that would prevent construction and digging for any reason. I will support the team's decision but this does cause me some concern. This decision is primarily for the Base to make since this is still an active range.

The MOUT area was re-opened as part of the active range inventory by the Marine Corps (approved through Headquarters Sept 12, 2012) and will not be included within the UXO-19 site boundary.

USEPA Region 4

Comments (Dated July 20, 2015)

1. Section 1, Site Name and Location, 3rd paragraph, sentence: The primary purpose of the FFA is... Add "and remediation of hazardous substances undertaken in accordance with CERCLA when determined necessary to protect human health and the environment."

This text was added as requested.

2. Section 1.1 Selected Remedy, Assessment of the Site, Second Paragraph: Highlight the term "LUCs" and add to glossary.

Highlighting/bold blue text in the ROD is used to denote a reference and not for glossary terms like the Proposed Plan. There is no glossary section in the ROD.

3. Section 1.1 Selected Remedy, Assessment of the Site, Second Paragraph: Add a sentence that describes generally what are ICs and LUCs and their purpose. See EPA PIME guidance Section 2 page 2.

"2. DEFINITION AND ROLE OF INSTITUTIONAL CONTROLS

For purposes of this document, EPA defines ICs as non-engineered instruments, such as administrative and legal controls, that help to minimize the potential for exposure to contamination and/or protect the integrity of a response action. ICs typically are designed to work by limiting land and/or resource use or by providing information that helps modify or guide human behavior at a site. ICs are a subset of Land Use Controls (LUCs). LUCs include engineering and physical barriers, such as fences and security guards, as well as ICs. The federal facility program may use either term in its decision documents. For purposes of this guidance, the term ICs is used, but the concepts also apply to LUCs."

The following sentence was added: LUCs include signs, educational programs, and administrative and legal controls that help to minimize the potential for exposure to contamination and protect the integrity of a response action.

4. Section 1.1 Selected Remedy, Statutory Determinations, Second Paragraph: Section 121(c) and the NCP at 40 Code of Federal Regulations (CFR) § 300.4309f(4)(ii). – Typo, parentheses missing before "f".

This typo has been fixed.

5. Section 1.3, Authorizing signatures: Change to Franklin Hill, Director

This change has been made.

6. Section 2.10.2, Description of the Selected Remedy: Add another LUC Objective: “Maintain the integrity of any current or future remedial or monitoring system such as the warning signs”

This objective has been added as requested.

7. Section 2.10.2, Description of the Selected Remedy: Add recommended language from EPA LUC Checklist #8: Although the Navy and MCIEAST-MCB CAMLEJ may later transfer these procedural responsibilities to another party by contract, property transfer agreement, or through other means, the Navy shall retain ultimate responsibility for the remedy.

This language has been added as requested.

8. Section 2.10.2, Description of the Selected Remedy: Ref. EPA LUC Checklist #9. Add “within 90 days of ROD signature” to the third paragraph, first sentence.

This has been added as requested.

9. Section 2.10.4, Statutory Determinations: Revise to strike the term 'adequate'. See suggested rewrite below. “Remedial actions undertaken at National Priority List (NPL) sites must meet the statutory requirements of Section 121 of CERCLA and ~~thereby achieve adequate or~~ adequate be protective of human health and the environment, comply with ARARs of both federal and more stringent state environmental laws and regulations unless a waiver is justified, be cost-effective, and utilize to the maximum extent practicable, permanent solutions and alternative treatment or resource recovery technologies.

This text has been updated as requested.

10. Section 2.10.4, Statutory Determinations: Protection of Human Health and the Environment: Please provide better description of how the LUCs will prevent exposure and limit the actions of personnel within the Site.

The description has been updated as follows:

Protection of Human Health and the Environment—The Selected Remedy (LUCs) will protect human health and the environment by prohibiting actions that could result in an explosive hazard through educational training for MEC/MPPEH avoidance, warning signs, and administrative controls restricting intrusive activities in areas and at depths that have not been previously investigated.

11. Section 2.10.4, Statutory Determinations, Utilization of permanent solutions and alternative treatment technologies...: Purpose of this Section is to describe whether the remedy meets these expectations not provide a rationale why no treatment was used. Revise to include a sentence(s) that states the remedy does not use excavation and treatment (e.g., detonation of UXO) or resource recovery technologies (e.g., recycling spent munitions).

This section has been revised to:

Utilization of Permanent Solutions and Alternative Treatment Technologies or Resource Recovery Technologies to the Maximum Extent Practicable—The Selected Remedy does not use permanent solutions such as excavation or treatment (detonation of MEC/MPPEH) or resource recovery (recycling of scrap or spent munitions).

12. Appendix A: Strike “Offsite Regulatory Requirements”, Revise Notice of Contaminated Site from “Applicable” to “To Be Considered”

These changes have been made.